

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO

DEUTSCHE BANK TRUST
COMPANY AMERICAS, et al.

Plaintiff

vs.

AMERICAN ELECTRIC POWER,
et al.,

Defendants

)
)
)
)
)
)
)
)
)
)
)

Case No. 1:11 cv 00358-SSB-SKB

Judge Sandra K. Beckwith

ANSWER OF DEFENDANT WILLIAM EFFRON KATZIN TO
THE SECOND AMENDED CLASS ACTION COMPLAINT

William Effron Katzin, individually and for the William Effron Katzin IRA Rollover (together referred to as “Katzin”), answers the Second Amended Class Action Complaint (the “Complaint”) as set forth below.

(1) The Complaint makes no allegation against, or reference to, Katzin except as a “Named Shareholder Defendant,” and Katzin has no knowledge on which either to admit or deny any allegation made in the complaint, except to state that prior to December 20, 2007 he was a shareholder of the Tribune Company, and that on or about December 20, 2007, one hundred percent of the shares he then owned (1,000 shares) were purchased from him in connection with the transaction that is the apparent subject of the Complaint for a total payment to Katzin of \$34,000.

(2) Katzin believes, and therefore avers, that the consideration received by him for purchase of shares of Tribune Company represented their full and fair value.

(3) As there is no allegation or reference to Katzin in the Complaint, no further response by him is necessary or appropriate. However, Katzin denies any implied or intended assertion that he was a party to any fraudulent transfer alleged in the Complaint.

WHEREFORE, Katzin respectfully requests that he be dismissed as a party to this action, and that he recover his costs.

Dated: December 16, 2011

/s/ Robert N. Rapp

ROBERT N. RAPP (0010961)
CALFEE, HALTER & GRISWOLD LLP
1400 KeyBank Center
800 Superior Avenue
Cleveland, Ohio 44114
Tel: (216) 622-8200
Fax: (216) 241-0816
E-mail: rrapp@calfee.com

Counsel for William E. Katzin and the
William Effron Katzin IRA Rollover

CERTIFICATE OF SERVICE

The foregoing has been filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic record. Parties may access this filing through the Court's electronic system.

Dated: December 16, 2011

/s/ Robert N. Rapp
Robert N. Rapp